REPORT OF PHONE CALL
VISIT

PE83 04/07/83

In _____ Out _____ File ✓

Date 4-7-83 Time 4:25

Routing _____

returned my call of 3:00 pm

Person Contacted R. O. Quimby Phone No. 315-456-2151

Location GE Electronics Parkway

Subject Part B application

Summary Talked to Mr. Quimby & Mr. Barry Pickett (Env. Engr). Told them I am handling their application and if they have any questions to let me call or if they would like to have a meeting to please call. They indicated that they didn't have any questions or problems at this time.

Action Required None

C. Massimino
Signature

The closure plan itself is a part of RCRA application and becomes an attachment to the RCRA permit.

2. The procedure used to decontaminate the storage areas must be described in detail including the washing medium, sampling and analytical procedures. The washings also must be analyzed for and if found hazardous, must be disposed of properly (40 CFR 264.178).
3. The underground tank also must be included in the closure plan. The cost estimate should be adjusted for this increased storage volume (40 CFR 264.112(a)(2)).
4. The application must state the approximate partial/final closure date (if known) (40 CFR 264.112(a)(1)).
5. The closure plan must give a detailed schedule of closure outlining various steps and the time taken for each step (40 CFR 264.112(a)(4)).
6. Basis for the cost of transportation, treatment and disposal of waste drums must be included.
7. Basis for the cost of transportation and disposal of the decontaminating fluid must be provided.
8. Cost of sampling and analysis to ensure the effectiveness of decontamination must be included.
9. Supervisory and overhead costs must be added to the total cost. This may be specified as a percentage of the subtotal cost.
10. An administrative cost of 15% must be added to the total cost.
11. Closure cost must include the cost of closure certification by a professional engineer.
12. The certificate of insurance must have the following:
    - Complete address of the insured
    - EPA ID numbers and address of each facility
    - Name, title and address of the authorized representative.

owner will submit a written report to the Regional Administrator on the incident per 40 CFR 264.56(i) and (j).

7. Per 40 CFR 264.52(e), the contingency plan must include the location, description and capabilities of all emergency equipment available at the facility.
8. An evacuation plan with criteria for evacuation and signals to be used to begin evacuation must be included in the application (40 CFR 264.52(f)).

VII. Personnel Training Program

1. The name and qualification of the training director should be included (40 CFR 264.16(a)(2)).
2. The actual field training given to familiarize personnel of the location and use of emergency equipment should be included per 264.16(3).
3. More description should be given regarding the training content, frequency of training, and techniques used in training along with a description of an annual review of training (40 CFR 264.16(c) and (d)(3)).
4. Discussion should be included in the application showing how the training given to personnel is relevent to the job description listed (40 CFR 264.16(a)(2)).

VIII. Closure Plans and Financial Requirements

1. The facility closure plan, as given in the application states that the closure plan will be submitted at least 180 days before the closure is started. This must be corrected to read that the Regional Administrator will be notified at least 180 days prior to the date closure is started.

plan (40 CFR 264.52 and 264.53).

2. The application must specify the primary emergency coordinator. A statement authorizing designated coordinators to commit the necessary resources to implement the contingency plan must be included in the application (40 CFR 264.52(d) and 264.55).
3. The application must describe the criteria for implementation of the contingency plan (40 CFR 264.52(a) and 264.56(d)).
4. The application must describe the methodology for immediate notification of facility personnel and necessary state/local agencies (40 CFR 264.56(a)).
5. The functions of the emergency coordinators described in Section V1.5(b) must include the following (40 CFR 264.56):
    (a) Identifying and quantifying the released material.
    (b) Assessing possible hazards to human health or environment due to the above release.
    (c) Advising the local authorities of any need to evacuate local areas.
    (d) Ensuring the fire or spill does not spread to other areas and collecting/containing spills.
    (e) Immediately after an emergency, the coordinator must ensure that all recovered waste and contaminated soils are treated, stored and disposed off properly.
    (f) The emergency coordinator must ensure that all emergency equipment are cleaned and fit for use before operations are resumed.
6. The application must document that any incident requiring the activation the contingency plan will be recorded and within fifteen days, the

2. The application must state that copies of the inspection schedule and logs are kept at least for three years from the date of inspection (40 CFR 264.15(d)).
3. The above inspection schedule must include the periodic inspection of the underground tank for level (daily) and for any structural deterioration (frequency depending upon its material of construction). Loading and unloading areas must be inspected on a daily basis (40 CFR 15(b)).
4. The inspection schedule also has to include the general inspection of the fire extinguishers, alarms for fire water pressure, safety showers, spill absorbents and personal protective gears (40 CFR 264.15(b)).
5. The application must outline the inspection procedures for the underground tank including the method for emptying it and precautions taken before anyone enters it for inspection (40 CFR 264.194).
6. The application must describe the remedial actions that will be taken to remedy any problems revealed during inspections (40 CFR 264.15(c)).
7. Per 40 CFR 264.32, all hazardous waste management facilities must have an internal communication or alarm system, external communication system for summoning external assistance, fire control equipment and fire water supply. The application must document the existence/availability of these equipment at the facility.
8. A description of the absorbents used to contain spills or leak and their disposal method must be included in Section V.3.
9. The application must include precautions taken when the drums are staged outside.

VI. Contingency Plan

1. The floor plan mentioned under item VI.4 is missing in the application. A copy of this plot plan must be included as part of the contingency

7. Underground tanks which are "enterable for inspection" are covered under existing regulations. Detailed analyses of these tanks including their design drawings in accordance with 264.190 - 264.199 must be presented if they are to remain in service. A procedure must be submitted for pressure testing these tanks for leaks by the Kent-Moore method or equivalent and for assessing these underground tanks for cracks, corrosion, erosion, wall thickness and joint integrity. This should include a procedure for emptying and cleaning the tanks to allow inspection. Documentation should be provided that the frequency of inspection is adequate based on the construction materials, rates of corrosion and erosion observed, the condition of the tanks and the characteristics of the waste. Results of such comprehensive inspection for each tank should be included in the application, per 40 CFR 264.194(b).
8. The process description should include the method and frequency for checking the level of any spilled liquid in the underground tank.
9. A drawing of the secondary containment system for the inflammables storage area must be included. A curb must be provided around the inflammable storage area to prevent any runoff into other parts of the Chem Annex building (40 CFR 264.175(b)).

V. Procedures to Prevent Hazards

1. In additon to the inspection log, an inspection schedule listing the various items to be checked, the type of problems to be looked into and the frequency of inspection must be included under Section V.2. The inspection log shown in the application must be corrected to conform to the schedule (40 CFR 264.15(a) and (b)).

2. For the secondary containment system, please provide a description that clearly demonstrates the system's adequacy to hold spills, leaks, run-ons and precipitation until detected and removed.

b. Drawings showing the dimensions of the storage and treatment areas, the number of rows, row length, stack height and width, aisle space and documenting a minimum distance of 50 feet between the containers and the facility boundary must be provided. The aisle space provided must be sufficient for emergency personnel and equipment to move around during emergencies.

c. Must demonstrate how existing container storage area meets 40 CFR 265 requirements.

d. Must provide closure plans and schedules for existing storage areas including its decontamination.

5. The aisle space used for storing drums in the flammable storage area must be sufficient to allow personnel and emergency equipment to move around in emergencies (40 CFR 264.35). Thus 30" aisle space used at present in the above storage is small. This must be increased to at least 36" for hand cart usage.

6. Drawings showing the following information on the ignitable storage must be included in the application.

   (a) Wall construction details

   (b) Floor construction details (material, sealant and slope).

   (c) Vent locations and blower capacities.

   (d) Type of door (fire door) and whether it remains locked always.

   (e) The containment facility to collect the floor washings into the underground tank.

is the same as the master index list number.

3. Under container management practices, there is a reference to leaking drums being returned to the generator for redrumming. This practice is unacceptable and unsafe. Any leaking drum must be either overpacked or must be redrummed at the receiving station. General Electric must make correction in the application accordingly.

4. Outdoor Staging of Containers: The application must describe the current outdoor staging of hazardous waste drums during their transhipment including its purpose, duration and must address, in detail, all technical requirements of 40 CFR 264.170 through 264.178 and 40 CFR 270.15 (Formerly 40 CFR 122.25(b)(1)). The attached checklist will be helpful in this area. Specifically the container management section must address the following:

   a. Must provide complete engineering and construction specifications, drawings and construction schedules for the new container storage ~~and treatment (e.g., decantation)~~ areas including the secondary containment systems. These must be approved by EPA and NYSDEC before construction is started.

      1. For the containment system, the drawing must include the curbs, berms, elevations, slope, water stops for joints and sumps, sealants, thickness of the base and provisions to prevent run-ons and for the removal of liquid spills. The base must be free of gaps and sufficiently impervious to contain leaks, spills and accumulated precipitation until removed. Please provide the specifications for the concrete, water stops, sealant and coatings and document the compatibility of these items with the materials stored in the container areas.

rationale for its selection, sampling method and analytical procedures with frequency of analysis (40 CFR 264.13(b)).

2. The application does not contain waste product records for some of the wastes stored at the facility (shown in Section V.4). These must be included.
3. If General Electric proposes to store additional wastes (other that shown Section V.4), waste analysis plan must include these additional wastes also.
4. Since the Facility is receiving wastes from off-sites, the application must include a plan to inspect each and every shipment. The plan must contain procedures to be followed to completely know the identity of the waste if the waste does not match the inforamtion provided on the waste product record. Records containing all the information obtained during these inspections must be kept (40 CFR 264.13(c)).
5. General Electric must commit to a language that analysis of off-site wastes will be done at least once a year or everytime the generation process changes.
6. The application must state what type of waste analysis information is supplied by the generator of off-site wastes.

IV. Process Information

1. The process information on containers should describe the different materials of construction and inside liners of drums used for storing different hazardous wastes. This information also must include the method by which the compatibility of the materials of construction and liners with the waste was established (40 CFR 264.172).
2. General Electric must clarify that that the waste code on the drum label

(c) The outdoor drum staging area and the underground tank connected to the inflammable storage area must be shown. Even though map II-2B is to a scale 1" = 200', it does not clearly show the actual hazardous waste storage areas and the outdoor staging areas in detail. A revised drawing to a larger scale showing the Chem annex building housing the hazardous waste storage areas with their elevation, under ground tank with their fill pipe elevation and the outdoor staging area elevation and its detail, must be enclosed with the revised application. This is required to evaluate how any spillages in these areas will flow and also the run-on and run-off provisions.

(d) Loading and unloading facilities and fire control facilities must be shown.

3. FIA maps should be included for demonstrating the flood plain standards. If FIA map is not available, other maps can be used with demonstration of an equivalent mapping technique. This map must also indicate the 100 year flood level. (40 CFR 270.14(b)(11)(iii))

4. The application must list separately the on-site wastes and off-sites wastes.

III. Waste Characteristics

1. The waste analysis plan as presented in the application is more or less a reproduction of EPA SW-846 test methods. This is insufficient. As per 40 CFR 264.13 and 270.14(b)(2) the waste analysis must contain all the information which must be known to treat, store or dispose off the wastes properly in accordance with Part 264. The waste analysis plan must describe the parameters for which each waste will be analyzed,

ATTACHMENT I

General Electric Co. (Electronic Park)

EPA I.D. No. NYD059385120

General Comment: Part B application requires a certification with the name, date and acceptable signature (40 CFR 122.6(d)).

I. Part A Application

1. GE must indicate the changes made in their original Part A Application. This may be done by enclosing copies of both the original and revised Part A Applications with descriptions of changes made therein in the general facility description section of Part B Application.
2. The Application must reconcile the total quantities of each hazardous waste included in item IV of form 3. This reconciliation must show which are the wastes included in each of the EPA hazardous waste numbers shown.

II. General Facility Description

1. The process description given is not sufficient. It must identify each waste and a brief description of its generation process. It must also include a brief description of the two waste water treatment plants and the hazardous sludges shipped off-site. Also include a description of the outdoor staging of the drums. (40 CFR 270.14(b)(1))
2. The topographic map must contain the following additional information (40 CFR 270.14(b)(19)).
   (a) The topographic map must extend 1000 feet beyond property lines.
   (b) All buildings must be labelled.

Mr. Charlie Branagh of NYSDEC Region 7, is the DEC contact person for this application. He can be reached at (315)428-4497.

Sincerely,

for Paul R. Counterman

Paul R. Counterman
Chief
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

Enclosures

cc: w/encl. - Catherine Massimino, EPA Region II*
Stephen Lackey, Region 7*
Charlie Branagh, Region 7*
Sevugan Chetty

*Without checklist

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

Henry G. Williams
Commissioner

January 27, 1984

Mr. James M. Reidy, P.E.
Chief
New York Hazardous Waste Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Re: Part B Application
Notice of Deficiency
General Electric Co. (Electronics Park)
Syracuse, New York
EPA I.D. No. NYD059385120

Dear Mr. Reidy:

The General Electric Company Part B Application for their Electronic Park Facility has been found to be incomplete. Enclosed is the draft Notice of Deficiency (NOD) that was prepared by Mr. Charlie Branagh of NYSDEC Region 7 and Mr. Sevugan Chetty of my staff. Also enclosed is a copy of the RCRA Permit Application Checklist. This NOD has most of the same comments as the preliminary draft NOD that we provided to EPA previously. The comments on the underground tanks, the topography of the Facility and outdoor staging of waste drums have been expanded. The NOD addresses the major deficiencies in the application, as well as certain other, more minor issues that will have to be addressed during the permitting process. Below are some of the major issues and questions that we have on the application.

At present, waste drums are staged outdoors on unpaved areas during their receipt and shipment. This is an unacceptable practice and the application does not describe this staging operation. As outlined in the NOD, this staging area must meet the requirements of 40 CFR 264.170 to 178 for container storages including the provisions of paved containment, secondary containment and run-on and run-off prevention. The construction specifications and drawings for this area must be submitted to DEC/EPA for approval before construction. The design drawings and testing procedures for the underground tank used as the secondary containment for the inflammables storage area, also have not been included in the application.